

The Honorable Lauren King

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

DECLARATION OF A.D.

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ATTORNEY GENERAL OF WASHINGTON  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-7744

1 I, A.D., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make  
3 this declaration based on my personal knowledge.

4 2. I have chosen to submit this declaration using only initials because I am fearful  
5 that the government could retaliate against me or my child, or individuals emboldened by recent  
6 actions of the federal government would target my family for speaking out.

7 3. I live in Seattle, Washington with my 15-year-old daughter Child A, who is trans  
8 female. Child A was designated male at birth. I am an attorney and my daughter's father is a  
9 chemist.

10 4. Child A informed me when she was nine that she was a girl. Prior to this, I had  
11 no idea that this was on her mind. She was getting into fights at school and the boys teased her.  
12 Child A was a lot smaller than the other boys her age. Once, the principal called to let us know  
13 that another boy had dragged Child A down the hallway. The principal asked if Child A was in  
14 therapy.

15 5. Her father and I were blindsided by her news that she was a girl. In retrospect, I  
16 can see that her refusal to let us take her picture since about the age of seven may have been a  
17 sign of gender dysphoria. She had me write up a contract for signature assuring that I wouldn't  
18 take her picture without prior permission.

19 6. When Child A was three, I enrolled her in a gender identity study with the  
20 University of Washington, now handled by Princeton University. I did this without any thought  
21 or awareness that she might ever come out as transgender; as I recall, there may have been a  
22 small financial incentive for taking part in the study. Years later, after she came out to us, I asked  
23 her if she had explored her gender earlier with the questions asked in the Princeton study. She  
24 replied that she did, and that for as long as she can remember she has experienced gender  
25 dysphoria. She reported in that study that she felt like a girl around six years old, but she did not  
26 tell me this at the time.

1           7. Her father and I were not transphobic, but we didn't know anyone personally who  
2 was transgender. At the time that Child A told us, she was in a classroom where gender and  
3 transgender identity were discussed. There, Child A watched a documentary about transgender  
4 individuals. She later told us that she assumed that her genitalia would match up to her female  
5 identity during puberty. When the documentary showed her that that wasn't the case, she knew  
6 she had to say something about being transgender.

7           8. As soon as Child A came out as a girl, I got her a therapist and did everything I  
8 could to give her the space to figure it out. I tried to remain neutral. She had at least six months  
9 of therapy sessions twice weekly before seeing a doctor. Her therapist diagnosed her gender  
10 dysphoria. When Child A first came out, she wanted everything pink. We shopped for new  
11 clothes the next day, and she once again wanted her picture taken. Her mood lifted dramatically.  
12 She was also able to pass as female amongst her peers. Child A switched to a new school and  
13 had her name and pronouns corrected.

14           9. We also started going to meetings with the organization Trans Families (now  
15 called Gender Diversity). That is how we found the doctor who provided her gender care. Her  
16 dad, a scientist, and I were concerned about the possible adverse effects of gender care. We were  
17 unsure that we would pursue gender-affirming medical care for our child. When one of the  
18 mothers at Trans Families quoted a study finding that kids who don't receive gender-affirming  
19 care are 40% more likely to have suicidal ideation—that did it for me. Understanding that all  
20 medical interventions carry risk, the question became whether we going to risk shortening our  
21 daughter's life in her later decades, or shorten it in her teens, through untreated gender dysphoria  
22 and the attendant risk of suicide. With that understanding, we gave consent for gender-affirming  
23 care. Her doctor ordered a bone density scan and bloodwork for baseline hormone levels. He  
24 affirmed Child A's identity and her right to seek, or quit, gender-affirming care. On multiple  
25 occasions the doctor told Child A, "this is your ship. You run the show."  
26

1           10. The clinical process included bloodwork for testosterone, and bone scans.  
2 Child A started puberty blockers at age 11, using an implant. She started taking estrogen 10  
3 months later, when she was 12. She's had the advantage of not having to go through male  
4 puberty. There's no Adam's apple, no facial hair, and she's able to pass as female. She's also an  
5 athlete. Contrary to anti-trans rhetoric, she's not stronger or taller or in any way athletically  
6 superior to her cis female peers.

7           11. Child A adamantly wants bottom surgery. Her doctor told us to get on waitlists.  
8 We're on waitlists out-of-state, with the next available appointment in March 2027. This hospital  
9 preemptively cancelled surgeries. They won't have in-person healthcare visits until age 18.  
10 Appointments are held via Zoom with the patient at age 17. Child A would have to get  
11 electrolysis on a certain part of her genitals and this must happen six months in advance of  
12 surgery. Seattle Children's hospital told us to call back at age 17. Child A wants surgery before  
13 going to college. She wants it as soon as possible.

14           12. I am aware of the Executive Order preventing gender-affirming care for people  
15 under age 19. I've been sleepless. I would be devastated if the restrictions in this executive order  
16 were to affect medical providers in Washington. It would have a tremendous impact on my  
17 daughter's mental health. I've researched how to obtain gender-affirming medical care if there  
18 were restrictions and how to move out of the country. It's imperative that Child A gets this care.  
19 This is what I know; I, who was originally on the fence. Even my straight older cisgender male  
20 friends, who have no sensitivity to LGBT issues, see her as a girl. It's who she is. Unfortunately,  
21 we have to go to a doctor to get continued care. Because of the fear of losing this medical care,  
22 she is preemptively getting a new blocker implant that will last four years, so she is not forced  
23 to go through male puberty in case her access to gender-affirming care is blocked by this  
24 Executive Order.  
25  
26

1 13. I worry about Child A becoming suicidal. I worry about her being ostracized at  
 2 school or kicked off of sports teams if she is "outed." It's her preference to pass as female and  
 3 not identify as transgender, a.k.a. going stealth.

4 14. I'm in a group with other parents of trans kids. We're all experiencing a  
 5 tremendous amount of worry. Some parents don't have papers in order and are now unable to  
 6 get corrected SSNs or passports. I'm worried about travel. Will her passport get seized? Will we  
 7 be able to get another passport with her corrected gender? Her dream is to play soccer in college.  
 8 Given the NCAA's preemptive cooperation with the administration's rules on trans athletes,  
 9 she's having to change her life plans. I'm strongly considering sending her to college outside the  
 10 United States, for her safety. I'm trying to stockpile enough estrogen until she is old enough to  
 11 get out of the country, and enough financial resources so we can leave before then if it becomes  
 12 necessary for her safety.

13 15. I'm very motivated to sue the federal government for these rights. Because my  
 14 daughter wishes to pass as female, for her own safety among other reasons, this could discourage  
 15 a private legal action against the federal government since that path would highlight my  
 16 daughter's gender transition.

17 I declare under penalty of perjury under the laws of the State of Washington and the  
 18 United States of America that the foregoing is true and correct.

19 DATED this 16<sup>th</sup> day of February 2025.

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 21   
 22 A.D.  
 23 Parent of CHILD A  
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